

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

MAR 16 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

BY
DEPUTY _____

UNITED STATES OF AMERICA	§	
	§	
V.	§	CRIMINAL NO. 6:16CR15
	§	
DOMINIC DENNARD GREEN (01)	§	SEALED
TRIMEAR LEECOY MCCUIN (02)	§	
a/k/a "Booger"	§	
CURTIS EUGENE THOMAS (03)	§	
CALVIN LEE BROWNING (04)	§	

SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT ONE

Violation: 18 U.S.C. § 2113(a)(b)(c) and 2
(Bank Burglary and Aiding and Abetting)

On or about February 9, 2016, in Cherokee County, within the Eastern District of Texas, the defendants, **Dominic Dennard Green, Trimear Leecoy McCuin a/k/a "Booger", Curtis Eugene Thomas, and Calvin Lee Browning**, aided and abetted by each other and by others, both known and unknown to the United States Grand Jury, did enter the Austin Bank, 1700 S. Jackson Street, Jacksonville, Texas 75766, with intent to commit in such bank, any felony or larceny affecting such bank, and did take and carry away with intent to steal and purloin U.S. currency in excess of \$1,000.00, belonging to and in the care, custody, control, management and possession of Austin Bank, a bank

whose deposits were then insured by the Federal Deposit Insurance Corporation, and did subsequently receive, possess, and store money which had been stolen, knowing the money had been stolen from such bank,

All in violation of Title 18, United States Code, Section 2113(a)(b)(c) and 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461

As a result of committing the offense as alleged in this indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461 all property involved in or traceable to property involved in the offense, including proceeds obtained directly or indirectly from the offense. Moreover, if any property subject to forfeiture, as a result of any act or omission by the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant up to the value of the forfeitable property.

A TRUE BILL



GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY



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3/16/16

Date

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NOTICE OF PENALTY

COUNT 1

Violation:	18 U.S.C. § 2113(a)(b)(c) and 2 (Bank Burglary and Aiding and Abetting)
Penalty:	Imprisonment for not more than 20 years; a fine of not more than \$250,000.00; or both, a term of supervised release of not more than 3 years.
Special Assessment:	\$100